

# **FEDERAL BUREAU OF INVESTIGATION**

## **REGULATORY INSPECTION REPORT (18 USC 2257)**

**OF**

**All Good Video  
(Sunshine Films, Inc.)  
7800 Airport Business Parkway  
Building 8  
Van Nuys, CA 91406**

**Date of Inspection: 08/16/2006**

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## REGULATORY INSPECTIONS REPORT

Report of: SSA Charles R. Joyner,  
Regulatory Inspections Unit,  
Violent Crime Section, Criminal Investigative Division  
Report Date: August 24, 2006  
File Number: [REDACTED] (F) All Good Video

### PRODUCER INFORMATION

An inspection was conducted of Sunshine Films, Inc. pursuant to 18 USC 2257 and 28 Code of Federal Regulations Part 75. All Good Video was the producer of the videos reviewed, but had since been purchased by Sunshine Films, Inc. The review of performer identification information and the record keeping system of Sunshine Films, Inc. was only of films produced by All Good Video. The inspection was conducted at Sunshine Films, Inc. on August 16, 2006, at 7800 Airport Business Parkway, Building 8, Van Nuys, CA 91406. [REDACTED] co-owns Sunshine Films, Inc. with her brother, [REDACTED] office telephone number (818)901-6350, fax number (818)901-6358, was identified as the point-of-contact (POC). [REDACTED] an employee of Sunshine Films, Inc., also was present and assisted in providing pertinent records.

[REDACTED] provided a copy of court records, dated 04/16/2004, which indicated Sunshine Films had purchased product from All Good Video and Odyssey Group. [REDACTED] explained All Good Video and Odyssey Group had gone out of business, and Sunshine Films, Inc. had successfully bid on the products those companies had in stock. SSA Joyner explained to [REDACTED] that Sunshine Films, Inc. had responsibility to maintain proper 2257 information upon the receipt and ownership of All Good Video films.

### INSPECTION SUMMARY

DVDs produced by All Good Video were ordered from the internet. Contract inspectors reviewed nine DVDs and identified all performers by stage name or by still photographs taken from the video. All videos reviewed contained the required 2257 information in the proper format. A total of 127 performers were identified as appearing in the nine DVDs. Prior to the inspection, contract inspectors printed several still photographs of each performer's face from different camera angles. During the inspection, the still photographs were compared with the performer identification on

record to ensure the identification was, in fact, of that performer.

After an inspection on August 16, 2006, it was determined All Good Video had several 2257 violations. These included: 2257 records were not maintained on the premises for five of the videos reviewed; identification photographs of 14 performers were of such poor quality they were not identifiable; no identification records were available for four performers; performers' names were not cross-referenced; and none of the records were maintained by performer name. Details of these violations are listed in the findings section of this report. Copies of available pertinent records were made by the inspection team.

During this inspection, all provisions of 18 USC 2257 guidelines were followed by the inspection team.



## FINDINGS

1. 2257 records for the following videos were not at the location:
  - a. Freshman Fantasies #21
  - b. Freshman fantasies #27
  - c. Straight A Students
  - d. Submissive Little Sluts #4
  - e. Shut Up and Blow Me, Volume 23
2. Inspection of records for "Old Dicks & Young Chicks #9" reflected the following:
  - a. Photograph of [REDACTED] (P-1) was of such poor quality it not identifiable (Tab 2 c)
  - b. No identification photograph was on file for [REDACTED] (P-1)  
[REDACTED] (P-1)
3. Inspection of records for "Shut Up and Blow Me, Volume 3" reflected the following:
  - a. Photograph of [REDACTED] (P-1) was of such poor quality it is not identifiable (Tab 2 b)
  - b. Photograph of [REDACTED] (P-1) was of such poor quality it is not identifiable (Tab 2 b)
  - c. Photograph of [REDACTED] (P-1) was of such poor quality it is not identifiable (Tab 2 b)
  - d. No photo identification was on file for [REDACTED] (P-1)
  - e. No photo identification was on file for [REDACTED] (P-1)  
[REDACTED] (P-1)
4. Inspection of Records for "Freshman Fantasies #1" reflected the following:
  - a. Photograph of [REDACTED] (P-1) was of such poor quality it is not identifiable (Tab 2 c)
  - b. Photograph identification of [REDACTED] (P-1) was a student identification card that did not contain a date of birth. (Tab 3)
  - c. Photograph of Jade, true name [REDACTED] (P-1) was of such poor quality it is not identifiable (Tab 2 c)
  - d. Photograph of [REDACTED] (P-1) (true name) was of such poor quality it is not identifiable (Tab 2 c)
  - e. Photograph of [REDACTED] (P-1) (true name) was of such poor quality it is not identifiable (Tab 2 c)
5. Inspection of "Shut Up and Blow Me, Volume 23" reflected the following:
  - a. Photograph of [REDACTED] (P-1) was of such poor quality it is not identifiable (Tab 2 d)
  - b. Records did not indicate [REDACTED] (P-1)

also used the stage name (P-1)

6. Inspection of "Freshman Fantasies #27" reflected the following:
  - a. No identification records were present for (P-1) (who appears in segment 4)
  - b. Photograph of (P-1) was of such poor quality it is not identifiable (this is a different (P-1) than listed above) (Tab 2 e)
  - c. Photograph of (P-1) was of such poor quality it is not identifiable (Tab 2 e)
  - d. Photograph of (P-1) was of such poor quality it is not identifiable (Tab 2 e)
  - e. Photograph of (P-1) was of such poor quality it is not identifiable (Tab 2 e)
7. None of the records were cross-referenced by performer names

**Producer Response to Findings:**

1. [REDACTED] later provided copies of 2257 records for the five videos. Based upon the fax sheets, these records were apparently received from Vivid Production.
2. Proper identification provided by [REDACTED] by mail on 08/29/2006.
3. Proper identification provided by [REDACTED] by mail on 08/29/2006.
4. Proper identification provided by [REDACTED] by mail on 08/29/2006.
5. Proper identification provided by [REDACTED] by mail on 08/29/2006.
6. Proper identification provided by [REDACTED] by mail on 08/29/2006.
7. [REDACTED] was advised of the need to cross reference 2257 information appropriately.

## **PRE-INSPECTION PROCEDURES**

The following Pre-Inspection Procedures were followed:

1. All Good Video was randomly selected from a data base provided by FBIHQ of known producers of adult products using a computerized random selection program.
2. A sample of All Good Video DVDs was ordered and the method of purchase was documented and maintained in a 1A envelope with the case file.
3. All products ordered were reviewed for 18 USC 2257 compliance and a pre-inspection analysis was conducted for each of the DVDs ordered.
4. All performers depicted in the videos engaging in sexually explicit conduct were identified by either a stage name or by still photographs of their likeness taken from the video.

## **INSPECTION PROCEDURES**

The following Inspection Procedures were followed:

1. Inspection began at approximately 9:30 a.m. during regular business hours.
2. SSA Charles Joyner, the Lead Inspector, immediately identified himself and the purpose of the inspection upon entering Sunshine Films, Inc.
3. SSA Joyner explained the nature and purpose of the inspection, including the limited nature of the records inspection.
4. Digital photographs were taken of the business and the room used to store 2257 information prior to the inspection. A disc containing a total of 13 photographs were placed in a 1A envelope and maintained with the case file.
5. Inspectors reviewed the 18 USC 2257 records maintained by Sunshine Films, Inc. for the nine videos reviewed, to include the performers appearing therein.
6. Copies were made of the selected performers' identifications indicating date of birth.
7. The inspection concluded at approximately 3:00 p.m.
8. Digital photographs were taken of the room used to store 2257 information prior to the inspectors departing the place of business.

# **RECORDS VERIFICATION SPREADSHEET**















# **INSPECTION COMPLIANCE DETERMINATION**

All Good Video (Sunshine Film, Inc.) was found **NOT** to be in compliance with 18 USC 2257 and 28 CFR 75.